

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major–Revised Permit No. F-03-002 R3
Sara Lee Foods – Claryville Facility
1099 Bob Huber Drive
Alexandria, Kentucky 41001
October 18, 2004
Ralph E. Gosney, Reviewer
Plant I.D. #: 21-037-00074
AI #: 586

SOURCE DESCRIPTION:

An application was received on October 13, 2004 for the minor revision of Permit F-03-002 R2. The name of the facility has changed from Hillshire Farm and Kahn's, to Sara Lee Foods. Three 12.56 mmBtu/hr natural gas-fired boilers are proposed for construction and operation at the facility (new Emission Units 22, 23, and 24 are included with Emission Unit 17). Emissions from the new units do not trigger major modification and will not change the monitoring, record keeping, and reporting requirements.

Permit F-03-002 R2 was completed on September 12, 2003 and issued to Hillshire Farm and Kahn's. The minor revision included the insignificant addition of a liquid smoke application process prior to the continuous oven (emission unit 004); and the federally enforceable reduction of the sawdust usage limits to the continuous and batch ovens.

Revision 1 of the operating/conditional major permit (F-03-002 Revision 1) was completed on June 25, 2003 and issued to Hillshire Farm and Kahn's. The existing permit is for the operation of heat exchangers and ovens for the packaging and production of meats. The applicant is permitted to operate four (4) indirect heat exchangers. These heat exchangers consist of three 8.37 mmBtu/hr natural gas-fired units and one 20 mmBtu/hr natural gas fired unit. The applicant is also permitted to operate (2) continuous and (12) batch meat-smoking ovens. The continuous ovens have a 1.65 mmBtu/hr heating rate, while the batch ovens have seven 2.75 mmBtu/hr and five 3.85 mmBtu/hr heating rates.

EMISSION AND OPERATING CAPS DESCRIPTION:

The source has agreed to take federally enforceable limitations on the ovens to preclude implementation of 401 KAR 52:020. The total amount of wood or sawdust for emission units 04 and 12 shall not exceed 550 tons/yr. The total amount of wood or sawdust for emission units 05-11, 13-16, and 18 shall not exceed 1300 tons/yr. Additional operating limitations are set out in Section D of the permit.

APPLICABLE REGULATIONS:

401 KAR 59:010, new process operations commenced on or after July 2, 1975.

401 KAR 59:015, new indirect heat exchangers, applicable to an emission unit with a capacity less than 250 mmBtu/hr and commenced on or after April 9, 1972.

401 KAR 60:005, incorporating by reference 40 CFR 60, Subpart Dc, Standards of performance for small industrial-commercial-institutional steam generating units, for units less than or equal to 100 mmBtu/hour but greater than or equal to 10 mmBtu/hour commenced after June 9, 1989.

OPERATIONAL FLEXIBILITY: None

CREDIBLE EVIDENCE:

This permit contains provisions that require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.